



Citizens Telephone Cooperative, Inc.

328 W Main St PO Box 127 New Auburn, WI 54757
Ph: (715)237-2605 Fax: (715)237-2812 Website: www.citizens-tel.net

Date: February 25, 2009

ELECTRONICALLY FILED

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street S. W.
Washington, D.C. 20554

RE: Certification of CPNI Filing, March 1, 2009 for 2008
FCC Docket EB 06-36
Form 499 Filer ID: 801393

Dear Ms. Dortch:

On behalf of Citizens Telephone Cooperative, Inc., and pursuant to Section 64.2009(e) of the FCC rules, please find attached the carrier's 2008 CPNI certification with accompanying statement. The documents are submitted in accordance with the directives set forth in the FCC's *Public Notice*, DA 09-9, EB Docket No. 06-36, released January 7, 2009.

Please contact me with any questions or concerns.

Sincerely,

Dennis L Bachman
Executive Vice President

More than just a Telephone Provider.
Your Pathway to the World

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 25, 2009

Name of company covered by this certification: Citizens Telephone Cooperative, Inc.

Form 499 Filer ID: 801393

Name of signatory: Dennis L Bachman

Title of signatory: Executive Vice President

I, Dennis L Bachman, certify that I am an officer of the Cooperative named above, and acting as an agent of the Cooperative, that I have personal knowledge that the Cooperative has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the Cooperative's procedures ensure that the Cooperative is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules, see Attachment A.

The Cooperative has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The Cooperative has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



Attachment A
Statement Concerning Procedures Ensuring Compliance with CPNI Rules

The operating procedures of Citizens Telephone Cooperative, Inc. ensure that the Cooperative complies with Part 64, section 2001 *et.seq.* of the FCC rules governing the use of CPNI.

The Cooperative has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Cooperative relies on the involvement of its supervisor/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Cooperative trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

The Cooperative has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Cooperative's CPNI Operating Procedures.

The Cooperative maintains records of its own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Cooperative has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Cooperative maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.

The Cooperative requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In store visits require a valid photo ID.

The Cooperative maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.